

ANDREW J. OGILVIE (SBN 57932)
CAROL M. BREWER (SBN 214035)
OGILVIE & BREWER LLP
3450 Sacramento St., #413
San Francisco, California 94118
Telephone: (415) 651-1950
Facsimile: (415) 651-1952

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND (SBN 83013)
STEPHEN J. NEWMAN (SBN 181570)
2029 Century Park East
Los Angeles, CA 90067-3086
Telephone: (310) 556-5800
Facsimile: (310) 556-5959

JAMES A. FRANCIS (*Pro hac vice*)
JOHN SOUMILAS (*Pro hac vice*)
FRANCIS MAILMAN SOUMILAS, P.C.
1600 Market St., Suite 2510
Philadelphia, PA 19103
Telephone: (215) 735-8600
Facsimile: (215) 940-8000

SHERMAN SILVERSTEIN KOHL ROSE
AND PODOLSKY
BRUCE LUCKMAN (*pro hac vice*)
308 Harper Drive, Suite 200
Moorestown, NJ 08057
Telephone: (856) 662-0700
Facsimile: (856) 448-4744

Attorneys for Plaintiff
Sergio L. Ramirez and the Class

Attorneys for Defendant,
Trans Union LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SERGIO L. RAMIREZ, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No. 3:12-cv-00632-JSC

FURTHER STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
ATTORNEYS' FEES AND COSTS

1 WHEREAS, Plaintiff Sergio L. Ramirez and Defendant Trans Union, LLC (the “Parties”)
2 previously stipulated that within ten (10) days of the Supreme Court taking action on the pending
3 petition for certiorari in this matter, that they would submit a joint report to this Court recommending
4 further scheduling regarding the fee petition in this matter;

5 WHEREAS, on December 16, 2020, the Supreme Court granted certiorari with respect to
6 one of the two questions raised in Defendant’s petition (Dkt. No. 373);

7 WHEREAS, briefing before the Supreme Court is scheduled for February and March 2021,
8 and the parties anticipate that there may be no action taken by the Supreme Court until June 2021;

9 WHEREAS, the Parties agree to report back to the Court within ten (10) days after the
10 Supreme Court’s disposition of the question accepted with a proposal regarding further proceedings;

11 WHEREAS, the Parties continue to agree that all arguments regarding any award of fees and
12 costs in this matter including with respect to all appellate proceedings, are preserved and should be
13 decided by the trial court;

14 WHEREAS, the Parties reached this agreement in good faith and believe it serves the
15 interests of justice and efficiency in this matter; to the extent the Court has any questions regarding
16 this agreement, counsel for the Parties are available for a telephonic or Zoom hearing to address
17 them;

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the
19 Parties, through their undersigned counsel of record as follows:

- 20 1. All discovery and briefing deadlines related to Plaintiff’s fee petition remain stayed;
- 21 2. All arguments regarding any award of attorneys’ fees and costs in this matter, from the
22 beginning of the case through trial and all appellate proceedings, are preserved and shall be
23 decided by the trial court after the issuance of a final order by the Supreme Court;
- 24 3. Within ten (10) days of the issuance of a final order by the Supreme Court, the Parties will
25 submit a joint report to this Court, recommending a procedure and schedule for further
26 proceedings regarding fees and costs.

FRANCIS MAILMAN SOUMILAS, P.C.

/s/ John Soumilas

JAMES A. FRANCIS
JOHN SOUMILAS
1600 Market Street, Suite 2510
Philadelphia, PA 19103
(215) 735-8600

OGILVIE & BREWER, LLP

ANDREW J. OGILVIE
ANDREW J. OGILVIE
CAROL MCLEAN BREWER
3450 Sacramento Street, #413
San Francisco, California 94118
Telephone: (415) 651-1950
Facsimile: (415) 651-1952

*Attorneys for Plaintiff
Sergio L. Ramirez and the Class*

**STROOCK & STROOCK &
LAVAN LLP**

/s/ Stephen J. Newman

JULIA STRICKLAND
STEPHEN J. NEWMAN
2029 Century Park East
Los Angeles, CA 90067-3086
(310) 556-5800

**SHERMAN SILVERSTEIN KOHL ROSE
AND PODOLSKY**

BRUCE LUCKMAN
308 Harper Drive
Suite 200
Moorestown, NJ 08057
Telephone: (856) 662-0700
Facsimile: (856) 448-4744

*Attorneys for Defendant
Trans Union, LLC*

~~**PROPOSED**~~ **ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. All discovery and briefing deadlines related to Plaintiff's fee petition remain stayed;
2. All arguments regarding any award of attorneys' fees and costs in this matter, from the beginning of the case through trial and all appellate proceedings, are preserved and shall be decided by the trial court after the issuance of a final order by the Supreme Court;
3. Within ten (10) days of the issuance of a final order by the Supreme Court, the Parties will submit a joint report to this Court, recommending a procedure and schedule for further proceedings regarding fees and costs.

SO ORDERED.

Dated: December 28, 2020

